

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
www.wbklaw.com

August 2, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *American Cellular Corporation*
E911 Quarterly Report – CC Docket No. 94-102

Dear Ms. Dortch:

American Cellular Corporation and its subsidiaries, by its attorneys, hereby submit the attached E911 Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.¹

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lawrence J. Movshin
Lee J. Rosen

Attachment

cc: David Solomon, Chief, Enforcement Bureau
John Muleta, Chief, Wireless Telecommunications Bureau
John Newman, Executive Director, APCO
Robert M. Gurss, Counsel for APCO
Dr. Robert Cobb, Interim Executive Director, NENA
James R. Hobson, Counsel for NENA and NASNA
Steve Marzolf, President, NASNA

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002).

E911 Status – Quarterly Report

CC Docket No. 94-102

August 2, 2004

Summary of Report

Pursuant to the *Order to Stay* and the Commission's Public Notice dated June 6, 2003,¹ American Cellular Corporation ("ACC"), as a Tier II carrier, provides this E911 Quarterly Report ("Report"). The Report provides information on all Phase I and Phase II requests received by ACC, including the PSAP ID, Name, State, County, Implementation Phase, Air Interface, Date PSAP Request Made,² Date PSAP Request Withdrawn, Invalid Request, Deployed, Date Deployed, Date Projected, Reasons and Comment. Detailed information regarding the requests is contained in the attached chart.

Phase I Service

ACC has received 85 requests for Phase I services and has activated service in all or in part in 79 of these jurisdictions. ACC has worked diligently with its third-party location solution vendor Intrado, as well as the public safety community, in coordinating Phase I deployment. The company remains committed to working with its vendors, the PSAPs, and state and local governments, in order to deploy Phase I services in these jurisdictions as soon as possible.

Phase II Service

A. Deployment Preparation

ACC is a mid-sized carrier servicing predominantly rural and suburban markets in 11 states. The company relies primarily upon a TDMA-based network of base stations and switching equipment.³ ACC's network consists of approximately 8 Mobile Switching Centers, all of which utilize equipment manufactured by Nortel Networks ("Nortel"). ACC has worked with Nortel to prepare for Phase II deployment; all switch upgrades necessary to supply Phase II services were completed by Nortel by June 2002.

In addition, ACC has executed an exclusive contract with Andrew Corporation to provide the Position Determining Entity equipment necessary to deploy its Phase II network-based

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002) ("*Order to Stay*"); Public Notice, "Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation," DA 03-1902 (rel. June 6, 2003).

² As indicated in the attached chart, the provided "request date" indicates the date the PSAP/requesting entity sent its request to ACC. This date may not correspond with the date the PSAP's/requesting entity's request was "valid" per Section 20.18(j) of the rules. 47 C.F.R. § 20.18(j); see also *Revision of the Commission's Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems*, *Petition of City of Richardson*, CC Docket No. 94-102, *Order*, 16 FCC Rcd 18982, 18986-87 (2001) ("*Richardson*").

³ As noted by the Commission, ACC is in the process of overlaying its TDMA network with GSM/GPRS technology. See *Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services*, *Eighth Report*, 18 FCC Rcd 14783, 14821 (2003). Phase I and Phase II service will be provided for GSM users as well.

location solution. The vendor has contracted to provide compliant Phase II services in response to all valid PSAP requests as discussed below. ACC is currently deploying Phase II services to its jurisdictions in accordance with mutually agreed-to timetables, which have been negotiated or are currently under discussion with PSAPs.

B. Phase II Requests

ACC has received Phase II requests from Hocking County, OH; the State of Minnesota; Green, Mercer, Taylor, Washington, Rowan, Laurel, Barren-Metcalf, Mason, Danville-Boyle, Madison, Adair, Monroe, Pulaski, Hardin, Washington, Garrard, Larue and Fleming Counties, KY; Schohaire and Otsego Counties, NY; Montgomery County, KS; Baraga, Dickinson, Menominee, Iron, Ontonagon, Marquette, Gogebic and Houghton Counties, MI; Marion, Monongalia, Harrison, Preston, Taylor, Doddridge and Ritchie Counties, WV. For each request, ACC is proceeding with deployment in good faith, even for PSAPs who have not yet provided *Richardson* documentation.

C. Deployment Issues

In Hocking County, despite its best faith efforts, ACC's network design may render meeting the Commission's accuracy requirements infeasible. ACC provides service in Hocking County via only one cell tower. While alternative solutions were considered, including collocation with other carriers, ACC is proceeding with Phase II deployment and intends to deploy additional cell sites to resolve accuracy problems.

Furthermore, in discussions with Andrew Corporation, ACC has learned that leasing and zoning issues may affect ACC's ability to meet the interim deployment deadlines in some markets. Specifically, in order to meet the Commission's network-based accuracy requirements, Andrew Corporation has informed the company that it will need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival ("TDOA") equipment that will be installed in individual cell sites. ACC has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

ACC brought similar matters to the Commission's attention in its original waiver request.⁴ Accordingly, if necessary, ACC may avail itself of further waiver procedures to account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.⁵

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSA.

⁴ See ACC Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

⁵ See *Order to Stay*, 17 FCC Rcd at 14853.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
2964	Laurel County E9-1-1	KY	Laurel/ London	1	TDMA/GSM	11/16/2000		N	Y	11/28/2001			
2964	Laurel County E9-1-1	KY	Laurel/ London	2	TDMA/GSM	6/30/2004		N	N		12/30/2004		
2868	Barren-Metcalfe E9-1-1	KY	Barren	1	TDMA/GSM	N/A		N	Y	11/27/2001			
2868	Barren-Metcalfe E9-1-1	KY	Barren	2	TDMA/GSM	5/4/2004		N	N		10/31/2004		
3001	Nelson County Sheriffs Department	KY	Nelson	1	TDMA/GSM	N/A		N	Y	11/27/2001			
3021	Rockcastle County 9-1-1	KY	Rockcastle	1	TDMA/GSM	N/A		N	Y	09/24/2001			
2993	Monticello-Wayne County Dispatch Center	KY	Wayne	1	TDMA/GSM	N/A		N	Y	09/24/2001			
2987	McCreary County 9-1-1	KY	McCreary	1	TDMA/GSM	N/A		N	Y	09/24/2001			
2986	Maysville Emergency Services	KY	Mason	1	TDMA/GSM	N/A		N	Y	08/29/2001			
2986	Maysville Emergency Services	KY	Mason	2	TDMA/GSM	6/10/2004		N	N		12/07/2004		
2923	Hart County Dispatch	KY	Hart	1	TDMA/GSM	N/A		N	Y	08/21/2001			
2898	Danville-Boyle County 9-1-1 Center	KY	Danville	1	TDMA/GSM	N/A		N	Y	08/14/2001			
2898	Danville-Boyle County 9-1-1 Center	KY	Boyle	1	TDMA/GSM	N/A		N	Y	08/14/2001			
2898	Danville-Boyle County 9-1-1 Center	KY	Boyle	2	TDMA/GSM	6/15/2004		N	N		12/12/2004		
2869	Bath County Dispatch	KY	Bath	1	TDMA/GSM	N/A		N	Y	06/05/2001			
2970	Lewis County Detention Center	KY	Lewis	1	TDMA/GSM	N/A		N	Y	06/05/2001			
2990	Menifee County Fire Dispatch	KY	Menifee	1	TDMA/GSM	N/A		N	Y	05/31/2001			
2972	Lincoln County 9-1-1	KY	Lincoln	1	TDMA/GSM	N/A		N	Y	05/31/2001			
3023	Russell County Dispatch	KY	Russell	1	TDMA/GSM	N/A		N	Y	05/18/2001			
2879	Burkesville Police Department	KY	Cumberland	1	TDMA/GSM	N/A		N	Y	05/18/2001			
2860	Albany Police Department	KY	Clinton	1	TDMA/GSM	N/A		N	Y	05/18/2001			
3029	Spencer County	KY	Spencer	1	TDMA/GSM	N/A		N	Y	08/09/2001			
2997	Mt Sterling Police Department	KY	Montgomery	1	TDMA/GSM	N/A		N	Y	09/19/2001			
2979	Madison County E9-1-1	KY	Madison	1	TDMA/GSM	N/A		N	Y	07/13/2001			
2979	Madison County E9-1-1	KY	Madison	2	TDMA/GSM	5/26/2004		N	N		11/22/2004		
2994	Morehead Police Department	KY	Morehead/Rowan	1	TDMA/GSM	11/9/2001		N	Y	12/07/2001			
2994	Morehead Police Department	KY	Morehead/Rowan	2	TDMA/GSM	05/21/2002		N	N		TBD	2,4	ACC has deployed an additional cell site in PSAP area and is engaged in on-going discussions with third party PDE providers to develop a Market Plan for location accuracy. ACC is engaged in on-going discussions with PSAP regarding deployment.
2859	Adair County 9-1-1 Center	KY	Adair	1	TDMA/GSM	7/2/2001		N	Y	12/06/2001			
2859	Adair County 9-1-1 Center	KY	Adair	2	TDMA/GSM	3/24/2004		N	N		09/20/2004		
2992	Monroe County Ambulance and 9-1-1 Center	KY	Monroe	1	TDMA/GSM	1/4/2001		N	Y	03/21/2002			
2992	Monroe County Ambulance and 9-1-1 Center	KY	Monroe	2	TDMA/GSM	5/20/2004		N	N		11/16/2004		
2884	Campbellsville 9-1-1 Communications	KY	Taylor	1	TDMA/GSM	12/4/2000		N	Y	03/22/2002			
2884	Campbellsville 9-1-1 Communications	KY	Taylor	2	TDMA/GSM	4/15/2004		N	N		10/12/2004		
2922	Harrodsburg Police Department	KY	Mercer	1	TDMA/GSM	4/30/2001		N	Y	05/01/2002			
2922	Harrodsburg Police Department	KY	Mercer	2	TDMA/GSM	3/23/2004		N	N		09/19/2004		
3017	Pulaski County 9-1-1	KY	Pulaski	1	TDMA/GSM	7/17/2000		N	Y	12/05/2001			
3017	Pulaski County 9-1-1	KY	Pulaski	2	TDMA/GSM	6/21/2004		N	N		12/18/2004		
2864	Anderson County Ambulance Service	KY	Anderson	1	TDMA/GSM	2/28/2001		N	Y	02/18/2002			
2920	Hardin County 9-1-1	KY	Hardin	1	TDMA/GSM	7/6/2000		N	Y	12/20/2001			
2920	Hardin County 9-1-1	KY	Hardin	2	TDMA/GSM	5/28/2004		N	N		11/24/2004		
2963	Larue County Dispatch	KY	Larue	1	TDMA/GSM	7/17/2000		N	Y	12/19/2001			
2963	Larue County Dispatch	KY	Larue	2	TDMA/GSM	6/29/2004		N	N		12/29/2004		
2916	Greensburg Police Department	KY	Green	1	TDMA/GSM	12/12/2000		N	Y	12/11/2001			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
2916	Greensburg Police Department	KY	Green	2	TDMA/GSM	7/15/2003		N	N		TBD	2, 4	ACC maintains only one cell site in area and location accuracy will be a problem; ACC is engaged in on-going discussions with third party PDE providers to resolve the situation and is engaged in on-going discussions with PSAP regarding deployment.
2890	Casey County Dispatch	KY	Casey	1	TDMA/GSM	N/A		N	Y	12/14/2001			
2875	Bracken County Dispatch	KY	Bracken	1	TDMA/GSM	N/A		N	Y	04/19/2002			
2886	Carlisle Police Department	KY	Nicholas	1	TDMA/GSM	N/A		N	Y	04/19/2002			
3020	Robertson County EMS	KY	Robertson	1	TDMA/GSM	N/A		N	Y	04/23/2002			
3030	Springfield-Washington County E9-1-1	KY	Washington	2	TDMA/GSM	3/31/2004		N	N		09/27/2004		
2962	Lancaster Garrard 9-1-1	KY	Garrard	2	TDMA/GSM	6/9/2004		N	N		12/09/2004		
2907	Flemming County Dispatch	KY	Fleming	2	TDMA/GSM	6/30/2004		N	N		12/30/2004		
7567	Marion County Central Communications	WV	Marion	1	TDMA/GSM	6/1/2000		N	Y	04/11/2001			
7567	Marion County Central Communications	WV	Marion	2	TDMA/GSM	9/2/2003		N	N		08/17/2004		ACC has worked with the PSAP to grant an alternative date for deployment.
7581	Morgantown Police Department	WV	Monongalia	1	TDMA/GSM	6/1/2000		N	Y	03/30/2001			
7581	Morgantown Police Department	WV	Monongalia	2	TDMA/GSM	9/2/2003		N	N		08/18/2004		ACC has worked with the PSAP to grant an alternative date for deployment.
7559	Harrison County Bureau of Emergency Services	WV	Harrison	1	TDMA/GSM	6/1/2000		N	Y	03/30/2001			
7559	Harrison County Bureau of Emergency Services	WV	Harrison	2	TDMA/GSM	9/2/2003		N	N		08/19/2004		ACC has worked with the PSAP to grant an alternative date for deployment.
7589	Preston County Communications Center	WV	Preston	1	TDMA/GSM	6/1/2000		N	Y	04/11/2001			
7589	Preston County Communications Center	WV	Preston	2	TDMA/GSM	9/2/2003		N	N		08/24/2004		ACC has worked with the PSAP to grant an alternative date for deployment.
7596	Taylor County Emergency Services	WV	Taylor	1	TDMA/GSM	6/1/2000		N	Y	08/27/2002			
7596	Taylor County Emergency Services	WV	Taylor	2	TDMA/GSM	9/2/2003		N	N		08/25/2004		ACC has worked with the PSAP to grant an alternative date for deployment.
7608	Wetzel County Emergency Communications	WV	Wetzel	1	TDMA/GSM	4/16/2003		N	Y	12/03/2003			
7605	West Union Fire Department (CCI)	WV	Doddridge	1	TDMA/GSM	6/30/2003		N	Y	11/14/2003			
7605	West Union Fire Department (CCI)	WV	Doddridge	2	TDMA/GSM	3/18/2004		N	N		TBD		ACC maintains only one cell site in area and location accuracy will be a problem; ACC is engaged in on-going discussions with third party PDE providers to resolve the situation and is engaged in on-going discussions with PSAP regarding deployment.
7593	Ritchie County (CCI)	WV	Ritchie	1	TDMA/GSM	6/30/2003		N	Y	11/14/2003			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
7593	Ritchie County (CCI)	WV	Ritchie	2	TDMA/GSM	3/18/2004		N	N		TBD		ACC maintains only one cell site in area and location accuracy will be a problem; ACC is engaged in on-going discussions with third party PDE providers to resolve the situation and is engaged in on-going discussions with PSAP regarding deployment.
7543	Barbour County Communications Center	WV	Barbour	1	TDMA/GSM	6/8/2004		N	N		12/05/2004		
3456	Marquette County Central Dispatch	MI	Marquette	1	TDMA/GSM	4/30/2001		N	Y	02/21/2002			
3456	Marquette County Central Dispatch	MI	Marquette	2	TDMA/GSM	1/28/2004		N	N		08/27/2004		ACC is working with 3rd party vendor to deploy request. ACC is communicating with PSAP regarding time frame for deployment.
3369	Dickinson County Sheriffs Office	MI	Dickinson	1	TDMA/GSM	4/30/2001		N	Y	02/21/2002			
3369	Dickinson County Sheriffs Office	MI	Dickinson	2	TDMA/GSM	1/27/2004		N	N		TBD		ACC maintains only one cell site in area and location accuracy will be a problem; ACC is engaged in on-going discussions with third party PDE providers to resolve the situation and is engaged in on-going discussions with PSAP regarding deployment.
3464	Menominee County Central Dispatch	MI	Menominee	1	TDMA/GSM	4/30/2001		N	Y	02/25/2002			
3464	Menominee County Central Dispatch	MI	Menominee	2	TDMA/GSM	1/29/2004		N	N		08/27/2004		ACC is working with 3rd party vendor to deploy request. ACC is communicating with PSAP regarding time frame for deployment.
3422	Iron County 9-1-1	MI	Iron	1	TDMA/GSM	4/30/2001		N	Y	02/27/2002			
3422	Iron County 9-1-2	MI	Iron	2	TDMA/GSM	1/20/2004		N	N		TBD	4	ACC maintains only two cell sites in area and location accuracy will be a problem; ACC is engaged in on-going discussions with third party PDE providers to resolve the situation and is engaged in on-going discussions with PSAP regarding deployment.
3516	Ontonagon County Sheriffs Office	MI	Ontonagon	1	TDMA/GSM	4/30/2001		N	Y	10/02/2003			
3516	Ontonagon County Sheriffs Office	MI	Ontonagon	2	TDMA/GSM	4/23/2004		N	N		10/17/2004		
3433	Keweenaw County Sheriffs Office	MI	Keweenaw	1	TDMA/GSM	4/30/2001		N	Y	09/30/2003			
3413	Houghton County Central Dispatch	MI	Houghton	1	TDMA/GSM	4/30/2001		N	Y	03/28/2002			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3413	Houghton County Central Dispatch	MI	Houghton	2	TDMA/GSM	1/6/2004		N	N		08/20/2004	4	ACC is working with 3rd party vendor to deploy request. ACC is communicating with PSAP regarding time frame for deployment.
3319	Baraga County Sheriff	MI	Baraga	1	TDMA/GSM	4/30/2001		N	Y	10/02/2003			
3319	Baraga County Sheriff	MI	Baraga	2	TDMA/GSM	9/19/2003		N	N		TBD	4	ACC is working with the 3rd party vendor to develop a market plan that will meet accuracy requirements.
3393	Gogebic County Sheriffs Office	MI	Gogebic	1	TDMA/GSM	2/24/2004		N	N		08/22/2004		
3393	Gogebic County Sheriffs Office	MI	Gogebic	2	TDMA/GSM	2/25/2004		N	N		08/22/2004		
3596	Aitkin County Sheriffs Office	MN	Aitkin	1	TDMA/GSM	1/31/2001		N	Y	03/20/2003			
3596	Aitkin County Sheriffs Office	MN	Aitkin	2	TDMA/GSM	3/1/2002		Y	N			2	State of Minnesota, Department of Administration, Statewide 9-1-1 Program has requested Phase II service for all counties in which ACC serves. Counties involved have not confirmed capabilities for Phase II. ACC has communicated this request in person to PSAP and awaits for documentation on PSAP readiness.
3600	Becker County Sheriffs Office	MN	Becker	1	TDMA/GSM	1/31/2001		N	Y	02/12/2003			
3600	Becker County Sheriffs Office	MN	Becker	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3601	Beltrami County Law Enforcement Center	MN	Beltrami	1	TDMA/GSM	1/31/2001		N	Y	07/10/2002			
3601	Beltrami County Law Enforcement Center	MN	Beltrami	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3610	Carlton County Sheriffs Office	MN	Carlton	1	TDMA/GSM	1/31/2001		N	Y	03/24/2004			
3610	Carlton County Sheriffs Office	MN	Carlton	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3612	Cass County Sheriffs Office	MN	Cass	1	TDMA/GSM	1/31/2001		N	Y	07/10/2002			
3612	Cass County Sheriffs Office	MN	Cass	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3620	Crow Wing County Sheriffs Office	MN	Crow Wing	1	TDMA/GSM	1/31/2001		N	Y	03/17/2003			
3620	Crow Wing County Sheriffs Office	MN	Crow Wing	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3623	Douglas County Sheriffs Office	MN	Douglas	1	TDMA/GSM	1/31/2001		N	Y	06/27/2002			
3623	Douglas County Sheriffs Office	MN	Douglas	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3633	Grant County Sheriffs Office	MN	Grant	1	TDMA/GSM	1/31/2001		N	Y	07/08/2002			
3633	Grant County Sheriffs Office	MN	Grant	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3640	Hubbard County Sheriffs Office	MN	Hubbard	1	TDMA/GSM	1/31/2001		N	Y	03/23/2004			
3640	Hubbard County Sheriffs Office	MN	Hubbard	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3643	Itasca County Sheriffs Office	MN	Itasca	1	TDMA/GSM	1/31/2001		N	Y	07/12/2002			
3643	Itasca County Sheriffs Office	MN	Itasca	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3645	Kanabec County Sheriffs Office	MN	Kanabec	1	TDMA/GSM	1/31/2001		N	Y	07/03/2002			
3645	Kanabec County Sheriffs Office	MN	Kanabec	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3648	Koochiching County Sheriffs Office	MN	Koochiching	1	TDMA/GSM	1/31/2001		N	Y	03/23/2004			
3648	Koochiching County Sheriffs Office	MN	Koochiching	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3650	Lake County Sheriffs Office	MN	Lake	1	TDMA/GSM	1/31/2001		N	N	TBD		2	Awaiting approval by State for mapping and routing technology. Further testing is necessary prior to deployment and engaged in on-going discussions with State/PSAP regarding same. Testing has occurred and data transmission issues were raised. Working with State and third party provider.
3650	Lake County Sheriffs Office	MN	Lake	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3667	Mille Lacs County Sheriffs Office	MN	Mille Lacs	1	TDMA/GSM	1/31/2001		N	Y	02/18/2003			
3667	Mille Lacs County Sheriffs Office	MN	Mille Lacs	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3685	Morrison County Sheriffs Office	MN	Morrison	1	TDMA/GSM	1/31/2001		N	Y	03/18/2003			
3685	Morrison County Sheriffs Office	MN	Morrison	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN
3695	Otter Tail County Sheriffs Office	MN	Otter Tail	1	TDMA/GSM	1/31/2001		N	Y	06/27/2002			
3695	Otter Tail County Sheriffs Office	MN	Otter Tail	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3698	Pine County Sheriffs Office	MN	Pine	1	TDMA/GSM	1/31/2001		N	Y	06/27/2002			
3698	Pine County Sheriffs Office	MN	Pine	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN
3701	Pope County Sheriffs Office	MN	Pope	1	TDMA/GSM	1/31/2001		N	Y	02/19/2003			
3701	Pope County Sheriffs Office	MN	Pope	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3716	St Louis County Emergency Communications	MN	St Louis North	1	TDMA/GSM	1/31/2001		N	Y	02/13/2003			
3716	St Louis County Emergency Communications	MN	St Louis North	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3717	St Louis County Emergency Communications	MN	St Louis South	1	TDMA/GSM	1/31/2001		N	Y	02/17/2003			
3717	St Louis County Emergency Communications	MN	St Louis South	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3617	Stevens County Sheriffs Office	MN	Stevens	1	TDMA/GSM	1/31/2002		N	Y	09/23/2003			
3617	Stevens County Sheriffs Office	MN	Stevens	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3724	Swift County Sheriffs Office	MN	Swift	1	TDMA/GSM	1/31/2001		N	Y	05/06/2002			
3724	Swift County Sheriffs Office	MN	Swift	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3726	Todd County Sheriffs Office	MN	Todd	1	TDMA/GSM	1/31/2001		N	Y	03/17/2003			
3726	Todd County Sheriffs Office	MN	Todd	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3730	Wadena County Sheriffs Office	MN	Wadena	1	TDMA/GSM	1/31/2001		N	Y	05/06/2002			
3730	Wadena County Sheriffs Office	MN	Wadena	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
3737	Wilkin County Law Enforcement Center	MN	Wilkin	1	TDMA/GSM	1/31/2001		N	Y	02/12/2003			
3737	Wilkin County Law Enforcement Center	MN	Wilkin	2	TDMA/GSM	3/1/2002		Y	N			2	See comment for Aitkin, MN (PSAPID 3596).
5369	Hocking County 9-1-1	OH	Hocking	1	TDMA/GSM	3/1/2002		N	Y	06/18/2002			

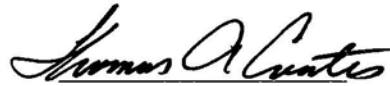
PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
5369	Hocking County 9-1-1	OH	Hocking	2	TDMA/GSM	3/1/2002		Y	N		TBD	4	ACC maintains only one cell site in area and location accuracy will be a problem. ACC has maintained contact and continued to work with PSAP to resolve deployment issues. ACC has begun the process of construction of additional towers to resolve accuracy problems. ACC intends to deploy fully once these issues can be resolved.
2788	Montgomery County Sheriffs Office	KS	Montgomery	1	TDMA/GSM	7/15/2002		N	Y	11/07/2003			
2788	Montgomery County Sheriffs Office	KS	Montgomery	2	TDMA/GSM	7/15/2002		Y	N		TBD	4	ACC is working with the 3rd party vendor to engineer means to comply with the FCC E-911 Phase II.
5197	Schoharie County Sheriffs Department	NY	Schoharie	1	TDMA/GSM	11/4/2002		N	Y	10/03/2003			
5197	Schoharie County Sheriffs Department	NY	Schoharie	2	TDMA/GSM	11/4/2002		Y	N		TBD	4	ACC maintains only two cell sites in area and location accuracy will be a problem; ACC is engaged in on-going discussions with third party PDE providers to resolve the accuracy problem. Engaged with PSAP on deployment schedule.
5173	Otsego County Public Safety Communication	NY	Otsego	1	TDMA/GSM	02/20/2003		N	Y	09/03/2003			
5173	Otsego County Public Safety Communication	NY	Otsego	2	TDMA/GSM	02/20/2003		Y	N		TBD	1	ACC is ready to deploy. LEC has had difficulty establishing trunks to the Selective Router. Engaged with PSAP on deployment schedule.
5220	Ulster County Emergency Communication Ce	NY	Ulster	1	TDMA/GSM	02/07/2003		N	Y	05/28/2004			
5068	Dutchess County Sheriffs Department	NY	Dutchess	1	TDMA/GSM	06/16/2003		N	N		TBD	1,2	ACC is ready to deploy. LEC has had difficulty establishing trunks to the Selective Router.

AFFIDAVIT OF THOMAS A. COATES

I, Thomas A. Coates, do hereby declare that the following is true and accurate:

I am an officer of American Cellular Corporation ("ACC").

I have reviewed the ACC E911 Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.

A handwritten signature in black ink, appearing to read "Thomas A. Coates", written over a horizontal line.

Thomas A. Coates
Vice President

Executed on: 7/30/04

CERTIFICATE OF SERVICE

I, Karla E. Huffstickler, hereby certify that on the 2nd day of August 2004, copies of the foregoing "E911 Quarterly Report" have been served by either first class mail, postage prepaid to the following:

David H. Solomon *
Chief
Enforcement Bureau
Federal Communications Bureau
445 12th Street, S.W., Room 7C-485
Washington, D.C. 20554

John Muleta *
Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

John Newman
Executive Director, APCO
APCO International, Inc.
World Headquarters
351 N. Williamson Blvd.
Daytona Beach, FL 32114

Robert M. Gurss
Director, Legal and Government Affairs
APCO International
1725 DeSales Street, N.W.
#808
Washington, D.C. 20036

Dr. Robert Cobb
Interim Executive Director
National Emergency Number Association
4350 North Fairfax Drive
Suite 750
Arlington, VA 22203

James R. Hobson
Counsel for NENA and NASNA
Miller & Van Eaton
1155 Connecticut Avenue, N.W.
Washington, D.C. 20036

Steve Marzolf
President, NASNA
VITA/Divs. Public Safety Cmn.
110 S. 7th St., Su. 100
Richmond, VA 23219-3931

/s/ Karla E. Huffstickler
Karla E. Huffstickler

* *Via Hand Delivery*